

## ALANA A. KARBAL

Attorney at Law

Direct Phone: 248-746-4027 Direct Fax: 248-936-2138 akarbal@sommerspc.com

March 3, 2025

Via Efiling

Honorable Jeffery P. Hopkins Potter Stewart U.S. Courthouse Room 810 100 East Fifth Street Cincinnati, OH 45202 (513) 564-7540

Re: Breslin, et al. v. The RDI Corporation, Case No. 1-24-CV-00279-JPH

Dear Judge Hopkins:

My name is Alana Karbal and I represent Plaintiffs Kambra Breslin, Kelsey Jackson, and Chad Brown, individually and on behalf of all others similarly situated, in the above referenced matter. I write on behalf of Plaintiffs without opposition from Defendant with regard to our Joint Stipulation to Issue Notice to Potential Opt-in Plaintiffs and Toll the Statute of Limitations for Putative Plaintiffs (Doc. 24, 24-1, 24-2).

In October 2024, the parties held meet and confers during which they discussed the possibility of alternative dispute resolution and submitting this case to mediation with a third-party neutral on behalf of **all opt-in plaintiffs**. From those meetings, they agreed to stipulate to issue notice to the collective identified in the stipulation before the Court and attend mediation on behalf of all the opt-ins in the case after the close of the opt-in period.

On November 25<sup>th</sup>, the Parties submitted the above referenced Joint Stipulation to Issue Notice (Doc. 24), as well as Proposed Notice and Email Notice (Doc. 24-1) and Proposed Order (Doc. 24-2).

Until the Notice is issued, the parties are unable to proceed, and mediation is delayed. They respectfully request that the Court advise them if either of the proposed documents (Doc. 24-1 and 24-2) require attention before they can be approved. As soon as the Order is approved and entered, Notice will be issued and the parties can proceed towards mediation. Of course, should the Court find a status conference appropriate, the parties are available and open to discussing any questions it has with the pending documents.

We appreciate your time and consideration of this matter.



Page 2

Respectfully submitted,

Sommers Schwartz P.C.

Alana Karbal

Olana Karbal